

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO**

IN RE: Pamela J. Burr ) Case NO.: 11-50760  
Aka Pamela J. Dampier ) Chapter 13  
 )  
 ) Chief Judge Marilyn Shea-Stonum  
Debtor )  
 )

**AMENDED OBJECTION OF PLYMOUTH PARK TAX SERVICES, LLC TO  
CONFIRMATION OF DEBTORS' CHAPTER 13 PLAN**

Plymouth Park Tax Services, LLC hereby objects to Confirmation of Debtor's Chapter 13 Plan. The debtor's plan, as proposed, fails to provide for the full payment, and interest rate of the pre-petition property taxes for the real property located at 870 Bisson Ave. Akron, Ohio 44307.

Debtor's Chapter 13 plan, as proposed, fails to list pre-petition arrears owing to Plymouth Park Tax Services, LLC in an amount of \$11,633.04 with 18% interest on the principal balance of \$7,231.47, as evidenced and broke down on the proof of claim and worksheet filed with this court.

**The debt of Plymouth Park Tax Services, LLC is governed by Ohio Revised Code § 5721.38(B), which provides:**

(B) At any time after payment to the county treasurer by the certificate holder to initiate foreclosure proceedings under section 5721.37 of the Revised Code ... the owner of record of the certificate parcel or any other person entitled to redeem that parcel may redeem the parcel by paying to the county treasurer the sum of the following amounts:

**... (2) Interest on the certificate purchase price for each tax certificate sold respecting the parcel at the rate of eighteen per cent per year for the period beginning on the day on which the payment was submitted by the certificate holder and ending on the day the parcel is redeemed under this division;**

**... (4) Reasonable attorney's fees in accordance with section 5721.371 [5721.37.1] of the Revised Code if the certificate holder retained a private attorney to foreclose the lien;**

**(5) Any other costs and fees of the proceeding allocable to the certificate parcel as determined by the court or board of revision.**

(Emphasis Added).

Plymouth Park Tax Services, LLC, pursuant to Ohio Revised Code § 5721.38(B), has properly included in its Proof of Claim, the amount due and owing as evidenced by the Proof of Claim filed.

WHEREFORE, until such time as the corrected arrearage figures, interest rate and fixed monthly payment are added into the plan, Plymouth Park Tax Services, LLC is unable to ascertain whether or not debtor's plan is truly feasible.

/s/ Scott W. Paris

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**CERTIFICATE OF SERVICE**

I Scott W. Paris hereby certify that the foregoing objection was sent by regular U.S. Mail, postage prepaid, this 24<sup>th</sup> day of March 2011 to the following:

Pamela Burr  
1050 Stoner  
Akron, OH 44320

Wells Fargo Home Mortgage  
PO Box 10335  
Des Moines, IA 50306-0335

Summit County Treasurer  
175 S. Main St  
Akron, Oh 44308-1353

I Scott W. Paris hereby certify that the foregoing objection was electronically transmitted on or about March 24, 2011 via the Court's CM/ECF system to the following who are listed on the Court's Electric Mail Notice List:

- Keith Rucinski efilings@ch13akron.com
- United States Trustee (Registered address)@usdoj.gov
- Robert M Whittington elkwhitt@neohio.twcbc.com

/s/ Scott W. Paris  
Scott W. Paris (0076595)